

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VMWARE LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 25-353 (RGA)
)	
SIEMENS AG, SIEMENS CORPORATION,)	
SIEMENS INDUSTRY SOFTWARE, INC.,)	
SIEMENS MEDICAL SOLUTIONS USA,)	
INC., SIEMENS HEALTHCARE)	
DIAGNOSTICS, INC., SIEMENS)	
MOBILITY, INC., and PETNET)	
SOLUTIONS, INC.,)	
)	
Defendants.)	

STIPULATION AND [PROPOSED] ORDER

WHEREAS, the current deadline for Defendants Siemens Corporation, Siemens Industry Software Inc., Siemens Medical Solutions USA, Inc., Siemens Healthcare Diagnostics, Inc., Siemens Mobility, Inc., and PETNET Solutions, Inc. to answer, move or otherwise respond to the Complaint is April 11, 2025;

WHEREAS, Defendant Siemens AG has not been served with any process but has agreed as part of this stipulation to waive service of process in accordance with Federal Rule of Civil Procedure 4(d) for this case only, while reserving all other rights and defenses in response to the Complaint;

WHEREAS, the parties have conferred regarding a single deadline for all defendants to answer, move or otherwise respond to the Complaint (D.I. 1);

NOW THEREFORE, IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that:

1. The time for the Defendants Siemens Corporation, Siemens Industry Software, Inc., Siemens Medical Solutions USA, Inc., Siemens Healthcare Diagnostics, Inc., Siemens Mobility, Inc., and PETNET Solutions, Inc. to answer, move or otherwise respond to the Complaint is extended by sixty days to June 10, 2025;
2. Siemens AG agrees to waive service of the Complaint in this case in accordance with Federal Rule of Civil Procedure 4(d) and its deadline to answer, move, or otherwise respond to the Complaint is set at June 10, 2025; and
3. Defendants reserve all rights and defenses to the Complaint other than service of process.

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Corporation, Siemens Industry Software Inc.,
Siemens Medical Solutions USA, Inc., Siemens
Healthcare Diagnostics, Inc., Siemens Mobility,
Inc., and PETNET Solutions, Inc.*

April 9, 2025

SO ORDERED this _____ day of April 2025.

UNITED STATES DISTRICT JUDGE